

**AMADOR COUNTY AIR POLLUTION CONTROL DISTRICT
TITLE V OPERATING PERMIT**

**ISSUED TO: North American Refractories Company,
 RHI Refractories America**

Facility Location: 8631 State Highway 124, Lone, California

Application Received: June 23, 1998

Nature of Business: Clay, minerals, and refractories manufacture

Primary SIC: 3255

Responsible Official: Larry D. Dilley, Vice President, Operations & Materials

Facility Contact Person: Mike Kizer, Mining Manager
 Phone: (209) 274-2471

Permit Number: Amador Title V - 01

Permit Issuance date: April 13, 2001

Permit Expiration Date: April 13, 2006

Date of Most Recent Revision: N/A

Approved For Issuance By:

/s/

Karen Huss, Air Pollution Control Officer
Amador County Air Pollution Control District

April 13, 2001
Date

I. FACILITY DESCRIPTION

This permit pertains to the operations of the North American Refractories Company, RHI Refractories America facility located at 8631 State Highway 124, Lone, California. RHI Refractories America processes non-metallic minerals (kaolin and fine-grained plastic clays) mined from a 6,500 acre tract of land near Lone, California. Calcined kaolin in its various forms is a major ingredient in refractories, investment casting, ceramics and other industrial applications throughout the world.

The facility is considered a federal major source of air pollutants due to its potential to emit greater than 100 tons per year of particulate matter, nitrogen oxides and sulfur oxides.

II. EQUIPMENT DESCRIPTION

This permit pertains to the following process equipment:

A. #3 MILL PROCESS

The major equipment in this process includes the #3 rotary dryer, #3 rotary kiln and cooler, pug mill, crusher and 5 deck screen. Other equipment includes feed belts, conveyors, mixers, elevators, hoppers, bins, storage tanks, wet scrubbers and baghouse.

B. #1 MILL PROCESS

The major equipment in this process includes the hammer mill, rotary kilns #1A and #1B and coolers, and pug mill extruder. Other equipment includes feed belts, conveyors, mixer, elevators, hoppers, storage tanks, storage shed and pad, tote bag filling, truck and rail loading, web scrubbers and baghouse.

C. AIR FLOAT KAOLIN PLANT

The major equipment in this process includes the Raymond mill, mill air heater, sacking machine and bulk bag station. Other equipment includes feed hopper, conveyor belts, pneumatic conveyors, storage and packaging tanks, cyclone, storage sheds, storage tanks and baghouse.

D. REFINED KAOLIN PLANT

The major equipment in this process includes the Bowen spray dryer. Other equipment includes conveyors, elevators, storage tanks, truck and rail loading, and baghouses.

E. META-KAOLIN PLANT

The major equipment in this process includes two Hurricane mills. Other equipment includes storage sheds and tanks, hopper, conveyors, pneumatic conveyors, bulk bag filling, sacking machine, bulk truck loading and baghouses.

F. ANCILLARY EQUIPMENT AND PROCESSES

This includes equipment related to solar clay mining and blunger, unpaved and paved roads, and gasoline dispensing.

III. APPLICABLE REQUIREMENTS – EMISSIONS AND OPERATIONAL LIMITATIONS

The following emission limitations and conditions of operation are adapted from District Rules approved in the SIP and pre-existing District operating permits for the RHI Refractories America facility. Pre-construction permits did not exist for most of the equipment at the facility since the facility pre-dates the formation of the District (1972).

A. PARTICULATE MATTER: No source may discharge particulate matter in excess of 0.1 grains per dry standard cubic foot (dscf) of exhaust gas, excluding sources emitting combustion contaminants only. This applies to all point sources at the facility. (Rule 207)

B. SULFUR COMPOUNDS: No source at this facility shall discharge sulfur compounds, calculated as sulfur dioxide (SO₂), in excess of 2000 parts per million by volume (0.2%) of exhaust gas. This applies to #1A and #1B rotary kilns, #3 rotary kiln, #3 rotary dryer, Raymond mill air heater, afterburner equipment on #1A kiln, and Bowen spray dryer. (Rule 210)

C. FUEL BURNING EQUIPMENT: No source at this facility shall discharge sulfur compounds in excess of 200 pounds per hour calculated as sulfur dioxide (SO₂); nitrogen oxides in excess of 140 pounds per hour calculated as nitrogen dioxide (NO₂); and combustion contaminants derived from the fuel in excess of 10 pounds per hour. This applies to #1A and #1B rotary kilns, #3 rotary kiln, #3 rotary dryer, Raymond mill air heater, afterburner equipment on #1A kiln, and Bowen spray dryer. (SIP Rule 19)

D. VISIBLE EMISSIONS: The facility shall not discharge any air contaminant into the atmosphere from any emission point that is greater than 20% opacity for a period or periods aggregating more than three (3) minutes in any sixty (60) minute period. (Rule 202)

E. FUGITIVE DUST: The facility shall take all reasonable efforts to control fugitive emissions. Fugitive emissions include all emissions that become airborne from equipment and systems associated with this permit to operate, except those that are emitted from an exhaust stack. (Rule 218) ***This condition is a District only rule (not in the SIP) and not federally enforceable.***

F. FUEL BURNING EQUIPMENT:

The facility shall burn only fuel oil, natural gas, or recycled fuel oil in its kilns and dryers. This applies to #1A and #1B rotary kilns, #3 rotary kiln, #3 rotary dryer, Raymond mill air heater, afterburner equipment on #1A kiln, and Bowen spray dryer. Any recycled fuel oil must be certified by the vendor to meet all California recycled fuel standards, including those for halogenated organics. No RCRA waste materials may be processed as a fuel. Maximum metals and total halogen content of the recycled fuel oil shall not exceed the following limits: (Rule 505)

Arsenic	5 ppm
Cadmium	2 ppm
Chromium	10 ppm
Lead	100 ppm
Total Halogens	1000 ppm

G. GASOLINE STORAGE TANK:

The gasoline storage tank must be equipped with a permanent submerged fill pipe. (Rule 213) All equipment associated with delivery, storage and transfer shall be maintained in a leak free and vapor tight condition and in good working order. (Rule 505)

H. NSPS APPLICABILITY:

Standards for non-metallic mineral processing - 40 CFR 60 Subpart OOO applies to reconstruction or any major modifications of clay processing plants for grinding mills, crushers, bucket elevators, bagging operations, or enclosed loading stations that have capacities of more than 10 tons per hour. The only such processes at the RHI Refractories America facility that have a capacity greater than 10 TPH are contained in #3 mill. None of this equipment has undergone "reconstruction" or a "major modification" as defined by the NSPS standard since the effective date of Subpart OOO, which was August 31, 1983. Therefore this NSPS standard is not applicable to any facility equipment at this time. Standards for calciners and dryers in mineral industries - 40 CFR 60 Subpart UUU applies to reconstruction or any major modifications of the rotary dryer or rotary kilns at the RHI Refractories America facility. These pieces of equipment have not undergone "reconstruction" or a "major modification" as defined by the NSPS standard since the effective date of Subpart UUU, which was August 23, 1986. Therefore this NSPS standard is not applicable to any facility equipment at this time.

IV. MONITORING AND TESTING (Rule 500 VI.B.5)

A. PARTICULATE FROM POINT SOURCES:

For applicable particulate emission requirements in section III. A., C. and D. the facility will perform the following monitoring and testing activities:

1. WET SCRUBBER OPERATIONS AND MAINTENANCE:

The facility shall operate wet scrubber emission control devices to control emissions from the #1A and #1B rotary kilns, the #3 rotary kiln, and the #3 dryer. The operator shall install, calibrate and maintain a manometer or equivalent pressure differential monitoring devices which provide continuous measurement of pressure differential across the wet scrubber devices. The wet scrubbers shall be operated with sufficient pressure drop to assure compliance with opacity requirements. The scrubber liquid shall be kept at a pH of 4.0 or greater due to the recycle system and thickener involved in the

process. The operator shall install, calibrate and maintain a flow measurement devices to record a continuous measurement of the quantity of liquid flowing within the wet scrubber devices. The two kilns in the #1 mill system (#1A & #1B) shall not operate simultaneously when one kiln is running to produce the light-weight aggregate product to ensure the wet scrubber devices operate optimally. The facility shall record at least once per day the pressure differentials and flow rates measured across the scrubbers in a log book. The log book of daily readings shall be kept for at least three years and made available to District staff on request. (Rule 505)

2. BAGHOUSE OPERATIONS AND MAINTENANCE:

The operation and maintenance requirements shall apply to the following equipment with baghouses: storage tank #1 (Meta & Refined Kaolin), storage tank #2 (Kaolin Plant), storage tank #3 (Kaolin Product Tank), kaolin plant, kaolin tank #1, Bowen spray dryer, #1 mill conveyor, kaolin sacking bin vent, Hurricane mill, and #3 mill crushing and screening. For each baghouse the facility shall prepare a maintenance plan for the operation of the baghouse. The facility shall schedule regular inspections for such problems as air leaks and loose or worn bags. The plan shall list repair procedures to be followed if emissions are observed. A copy of the plan shall be provided to the District. A supply of replacement bags shall be kept on site and number no less than 10 % of the total number of bags in the baghouse. A maintenance log shall also be maintained showing when maintenance was performed and when bags were replaced. (Rule 505)

3. VISIBLE EVALUATIONS

The facility will conduct one opacity observation by an EPA Method 9 certified VE reader at least once during each calendar month while the following point sources are in operation: exhaust stacks from kilns #1A, #1B, #3, #3 rotary dryer, Raymond mill air heater, Bowen spray dryer and baghouses.

4. STACK TESTING OF KILNS EXHAUST THROUGH WET SCRUBBERS

Under normal operating conditions, the facility will conduct stack tests of the # 3 rotary kiln wet scrubber, the #1A rotary kiln and the #1B rotary kiln wet scrubber at least once during the duration of this permit to determine the emissions of particulate matter, hydrogen chloride and hydrogen fluoride. The tests shall be conducted within 180 days of the first operation of each kiln after the Title V permit has been issued. If any one of the kilns does not operate 180 days during the life of the Title V permit, the testing of that kiln is not required. The hydrogen fluoride and hydrogen chloride emissions shall be determined using EPA Method 26A (40 CFR 60 Appendix A) or an equivalent method approved by the Air Pollution Control Officer. The particulate matter content of the exhaust gases from the stack shall be determined using EPA Method 5 -with the impinger train included or an equivalent method approved by the Air Pollution Control Officer. A copy of the stack test plan of procedure and a notice of the testing date shall be submitted to the Air Pollution Control District at least 30 days prior to the date the test is conducted.

5. LIGHTWEIGHT AGGREGATE PRODUCTION SPECIFICATIONS:

Rotary kiln emissions shall be ducted through an afterburner with supercharger whenever the light weight aggregate product is being produced on Kiln #1A or Kiln #1B. Rotary kiln emissions shall be ducted through a supercharger whenever the light weight aggregate product is being produced on Kiln #3. (Rule 505)

6. STACK TESTING OF KILNS EXHAUST THROUGH SUPERCHARGERS, AFTERBURNER AND WET SCRUBBERS

While producing light weight aggregate, the facility will conduct stack tests of the #3 rotary kiln wet scrubber with the use of a supercharger on the kiln, #1A and #1B rotary kilns wet scrubber with the use of a supercharger and afterburner on the kiln at least once during the duration of this permit to determine the emissions of particulate, hydrogen chloride and hydrogen fluoride. The tests shall be conducted within 180 days of the first operation of each kiln after the Title V permit has been issued. If any one of the kilns does not run light-weight aggregate during the life of the Title V permit, the testing of that kiln is not required. The hydrogen fluoride and hydrogen chloride content of the exhaust gasses from the stack shall be determined using EPA Method 26A (40 CFR 60 Appendix A) or an equivalent method approved by the Air Pollution Control Officer. The particulate matter content of the exhaust gases from the stack shall be determined using EPA Method 5 -with the impinger train included or an equivalent method approved by the Air Pollution Control Officer. A copy of the stack test plan of procedure and a notice of the testing date shall be submitted to the Air Pollution Control District at least 30 days prior to the date the test is conducted.

B. PARTICULATE FROM NON-POINT SOURCES:

For sections III.D. and E. the facility will perform the following monitoring and testing activities: The facility will conduct semi-annual testing of non-point sources in accordance with EPA Method 22. If fugitive emissions are not measured using this method, then no further testing will be required. If emissions are observed, the facility will perform an evaluation using an EPA Method 9 certified reader within 24 hours of the Method 22 evaluation to determine compliance.

C. SULFUR OXIDE REQUIREMENTS:

The facility is not required to test for sulfur oxide emissions for limits set forth in sections III.B. and C. The facility is considered to be in compliance with the limits based on stack testing performed in 1980s on Kiln #3 and Kiln #1A and on engineering calculations provided in the permit application for all fuel burning equipment.

D. NITROGEN OXIDE REQUIREMENTS:

The facility is not required to test for nitrogen oxide emissions for the limit set forth in section III.C. The facility is considered to be in compliance with the limit based on engineering calculations provided in the permit application for all fuel burning equipment.

E. FUEL SPECIFICATION:

The facility is not required to test for the metals and total halogen content of recycled fuel oil set forth in section III.F. The facility is required to monitor the testing analysis provided by the recycled fuel oil supplier.

F. GASOLINE STORAGE TANK:

The facility is assumed to be in compliance with section III.G. based on the permit to operate application supplied by the facility. The facility is required to conduct regular maintenance of the equipment.

V. RECORDKEEPING (Rule 500 VI.B.6, Rule 505 and Rule 513)**A. MINIMUM RECORDKEEPING REQUIREMENTS:**

The facility shall keep records of the above monitoring and testing activities including: date, place and time of sampling; operating conditions at the time of sampling; date, place and method of analysis; and results of the analysis.

B. RECORD RETENTION:

The facility shall maintain records of all required monitoring data and support information for a period of at least 5 years from the date of sample collection, measurement, report, or application.

C. ADDITIONAL SPECIFIC REQUIREMENTS:

The Air Pollution Control Officer may require the facility to keep records necessary to show compliance with the conditions of this permit. The following specific records have been required:

1. The facility shall keep records when any fuel burning equipment is switched between natural gas and fuel oil.
2. The facility shall record the quantity of fuel (natural gas, fuel oil or recycled fuel oil) burned in the #1A and #1B rotary kilns, #3 rotary kiln, #3 rotary dryer, Raymond mill air heater, afterburner equipment on #1A and #3 kilns, and Bowen spray dryer the kilns and dryers.
3. The facility shall record the hours of operation of all permitted equipment.
4. The facility shall record the amount of raw materials processed by all permitted equipment.

VI. REPORTING AND COMPLIANCE (Rule 500 VI.B.7)**A. MINIMUM REPORTING REQUIREMENTS:**

The facility will report at a minimum the following information to the District:

1. Conditions that result in any excess emissions or other violations of this permit, including those due to emergency, upset or breakdown conditions. The facility shall notify the District by telephone or facsimile within two (2) hours of the start of the event. A written report must be submitted to the Air Pollution Control Officer within one week (7 days) of the event. (Rule 516, SIP Rule 404).
2. A monitoring report identifying deviations from permit requirement, including those reported in VI. A.1. above. The monitoring report must include the probable cause of each deviation and any preventative or corrective action taken by the facility. The monitoring report must be submitted six months after the issuance of this permit, and every six months thereafter.
3. A progress report on any compliance schedule for equipment that is not in compliance with this permit as noted in VI. A.2. above. The progress report must include the date when compliance will be achieved, an explanation of why compliance was not, or will not be achieved by the scheduled date, a log of any preventative or corrective action taken, and a written statement from the responsible official of the facility which certifies the truth, accuracy and completeness of the report. The progress report must be submitted semi-annually.
4. The facility shall furnish, in a timely manner, any information or records requested by the Air Pollution Control Officer pertaining to emissions compliance, production records, equipment and facility operations, or other air quality related information. (Rule 500 VI.B.6., Rule 513 and Rule 505)
5. By January 31st of each year, the facility shall provide a written report to the District describing the annual material throughput, fuel usage, and hours of operation for all equipment associated with this permit for the previous calendar year. (Rule 513)
6. Notification of the switch of fuel (natural gas and fuel oil) will be provided to the ACAPCD within 2 working days.(Rule 505)

B. EMERGENCY PROVISIONS – In addition to the notification requirements of VI.A.1. in the case of an emergency at the facility, the responsible official shall submit to the ACAPCD a signed contemporaneous log and other evidence that demonstrates the following: an emergency occurred, the cause of the emergency, the facility was being properly operated at the time of the emergency, all steps were taken to minimize the emissions resulting from the emergency and within two (2) working days of the emergency provide the ACAPCD with a description of the emergency and corrective actions taken. (Rule 500 VI.B.12)

C. COMPLIANCE PLAN:

Insofar as the facility is currently in compliance, the compliance plan consists of continued adherence to the requirements of this permit and those requirements set forth in applicable regulations and statutes. (Rule 500 VI.B.8.)

D. COMPLIANCE SCHEDULE:

Insofar as the facility is in compliance at the time of the issuance of this permit, no schedule is required to attain compliance. (Rule 500 VI.B.9.)

E. COMPLIANCE CERTIFICATION:

In order to demonstrate compliance with the provisions of this permit, the Permittee shall submit an Annual Emissions Report and Certification Statement by the anniversary date of the permit describing the emissions of regulated pollutants for the previous calendar year. The compliance certification shall include the following as a minimum: identification of each term or condition of the permit that is the basis for the certification; the compliance status; whether compliance was continuous or intermittent; and the methods used for determining the compliance status of the source, both currently and over the entire statement reporting period. The Annual Emissions Report and Certification Statement and any additional reports or compliance certifications submitted shall be certified by a responsible official for truth, accuracy, and completeness. Submission of fraudulent data or information may be deemed a criminal violation. All documents must be submitted to both of the following: (Rule 500 VI.B.14.)

Director, Air Division
U.S. EPA
75 Hawthorne Street, AIR-3
San Francisco, CA 94105

Air Pollution Control Officer
Amador APCD
500 Argonaut Lane
Jackson, CA 95642

VII. GENERAL CONDITIONS

A. DUTY TO COMPLY: The facility shall comply with all terms and conditions of this permit. (Rule 500 VI.B.11.)

B. LIMITATION: This permit does not release the facility from the duty to comply with any requirements of any applicable statute, ordinance, code or law, including any Federal requirements, statutes of the State of California, County of Amador, city ordinances or other legal requirements. This permit does not authorize emission of air contaminants in excess of limits established by the Code of Federal Regulations, the California Health and Safety Code or the Rules and Regulations of the ACAPCD. (Rule 507)

C. PROPERTY RIGHTS: This permit does not convey any property rights of any sort, or any exclusive privilege. (Rule 500 VI.B.11)

D. VIOLATION: Any permit noncompliance constitutes a violation and is grounds for enforcement actions, permit termination, permit revocation, re-issuance, or modification, or for denial of a permit renewal application. Each day of non-compliance constitutes a separate violation. (Rule 500 VI.11.)

E. SEVERABILITY: The provisions of this permit are severable, and should any one or more be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected. The rights and obligations of the facility shall be construed and enforced as if the permit did not contain the particular provision held to be invalid and the applicable requirements underlying these provisions shall remain in force. (Rule 500 VI.B.13.)

F. DUTY TO PAY: Failure to pay fines, fees or other assessed charges from the District may result in enforcement action or termination of the permit or both. All fines, fees or other assessed charges are due and payable within 30 days of receipt of the invoice by the facility. (Rule 500 VII.)

G. PERMIT TRANSFER: Upon change of control or ownership, the applicant shall notify any succeeding owner or operator of this facility of the existence of this permit in writing, a copy of the notification shall be provided to the District. The terms and conditions of this permit shall be binding on all subsequent owners or operators. A request for an administrative amendment shall be sought for changes in ownership or address of the facility. (Rule 500 and Rule 517)

H. PERMIT REOPENING: This permit may be terminated, suspended, reopened, or amended for cause. Any request from the facility for revisions to the permit, planned non-compliance or other planned changes shall not stay the conditions of the permit. This permit must be reopened and revised if any of the following occur: additional requirements become applicable to the equipment subject to this permit and three or more years remain before the permit expires; additional requirements become applicable to an affected source under the acid rain program; the Air Pollution Control Officer or the EPA Administrator determines that the permit contains a material mistake, inaccurate statements were made in establishing the emission standards, other terms or conditions of the permit, or the permit must be revised or revoked to ensure compliance with the applicable requirements or ACAPCD regulations; or the EPA Administrator finds that cause exists pursuant to Rule 500 V.H., or in response to a public petition. (Rule 500 VI.B.11.)

I. PERMIT OR EQUIPMENT MODIFICATIONS: This permit may be modified to reflect changes in operation, procedure, ownership or other provisions as necessary by following procedures specified in ACAPCD Rule 500. Any modification other than normal repair and maintenance, or a change that is not allowed under the operation of this permit or Rule 500 V.I., shall require a revised or new permit. If a new or revised permit is required, the operator shall make application to the Air Pollution Control Officer and follow the procedures as specified in ACAPCD Rule 500 IV.

J. POSTING OF PERMIT: This permit shall be posted on or near the equipment listed above. This permit shall be readily available for inspection at all times while the equipment is operating. The permit (or a copy) shall be prominently displayed in a location accessible to all persons operating this equipment system (Rule 508).

K. RIGHT TO ENTER: Upon presentation of proper credentials and other documents as may be required by law and in accordance with constitutional limitations, the facility shall allow the District, the U.S. EPA and the ARB, or an authorized representatives to perform the following: enter upon the premises where an actual or potential source is located or where any records are kept as required to demonstrate compliance with the terms and conditions of this permit and to have access to and copy, at reasonable times, these records; inspect at any time while the plant is open for business or in production any facilities, equipment (including monitoring and control equipment), practices or operations regulated or required under this permit; and sample or monitor any substances or parameters at any location and obtain and remove samples of any discharge or emission of pollutants, The facility may conduct parallel sampling for verification purposes. (Rule 500 VI.B.10. and Rule 509)

L. EMISSIONS TRADING: No permit revision shall be required for increases in emissions allowed under any approved economic incentives, marketable permits, emissions trading, or other similar programs or processes for changes that are provided for elsewhere in this permit and that are authorized by the applicable requirement. The facility has requested and has been granted the right for trading emissions increases and decreases within the facility to the extent the applicable requirements provide for such trading and have been approved as tradable by the Air Pollution Control Officer. (Reference 40 CFR 70.6 (a)(8)).

M. DEFENSES TO ENFORCEMENT ACTIONS:

1. Need to Halt Activity - It shall not be a defense for a facility in an enforcement action that it would have been necessary to halt or reduce activity to maintain compliance. (Rule 500 VI.B.11)

2. Emergency Upset, Breakdown or Scheduled Maintenance - An emergency upset or breakdown condition shall be an affirmative defense to an enforcement action only if the conditions set forth in ACAPCD Rule 516 are met.

N. CONFIDENTIAL RECORDS: Any request for confidential designation of records must be made in writing to the Air Pollution Control Officer as specified in Rule 514.

O. TERMS: Terms not otherwise defined in the permit shall have the meanings assigned to such terms in the referenced regulations. (Reference 40 CFR 70.2).

P. ASBESTOS REMOVAL: The facility shall comply with the provisions of 40 CFR Part 61, subpart M (Asbestos) during any renovation or demolition activity at this facility. (Reference 40 CFR 70.6 (a)(1)(i) and 40 CFR Part 61, subpart M (Asbestos)).

Q. STRATOSPHERIC OZONE: The facility shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, subpart F Recycling and Emissions Reduction. (Reference 40 CFR 70.6 (a)(1)(i) and 40 CFR Part 82, subpart F).

R. RISK MANAGEMENT PLAN: Should the facility become subject to 40 CFR Part 68, the facility shall comply with the standards within the required timeframe in the regulations and subsequently certify compliance with Part 68 as part of the annual compliance certification required in VI.E. of this permit.

S. NSPS: Should the facility become subject to an existing or newly promulgated New Source Performance Standard (see III.H.), the facility shall comply with the standards within the required timeframe in the regulations. (40 CFR 60)

T. NESHAPS: Should the facility become subject to an existing or newly promulgated National Emission Standards for Hazardous Air Pollutants for Source Categories, the facility shall comply with the standards within the required timeframe in the regulations. (40 CFR 63)

U. SECTION 502 (b)(110) CHANGES: The facility shall monitor for and record, any section 502(b)10 change to the source, which is defined as a change that would contravene an express permit term. Notice must be given to the Air Pollution Control District for any such change seven days in advance of enactment. (Reference 40 CFR 70.4 (12), Clean Air Act Section 502(b)(10).

V. PERMIT TERM: This permit shall be valid for a period of five (5) years from the date the permit is approved for issuance. The right to operate terminates on the permit expiration date. If a written application for renewal of the permit is submitted at least six (6) months (but not more than 12 months) prior to expiration, the facility may continue to operate equipment in accordance with the conditions of this Title V permit until final action is taken by the District on the renewal application. (Rule 500 VI.B.15.)